

1 THE HONORABLE RICARDO S. MARTINEZ  
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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE WESTERN DISTRICT OF WASHINGTON  
10 AT SEATTLE

11 QUNESHIA RAWLS, individually and on  
12 behalf of all others similarly situated,

13 Plaintiffs,

14 v.

15 CONVERGENT OUTSOURCING, INC.,

16 Defendant.

Case No. 2:20-cv-01538-RSM

**JOINT STIPULATION TO EXTEND  
DEADLINE FOR DEFENDANT TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

17 **I. STIPULATION**

18 Pursuant to LCR 7, Plaintiff QUNESHIA RAWLS and the opt-in Plaintiffs, by and through  
19 their counsel, Frank Freed Subit & Thomas, LLP and Anderson Alexander, PLLC, and Defendant  
20 CONVERGENT OUTSOURCING INC., by and through its counsel, Jackson Lewis P.C., hereby  
21 stipulate and jointly move this Court for an order extending the deadline for Defendant to file and  
22 serve its Response to Plaintiff's Complaint and extending all other case management deadlines  
23 accordingly.

24 The parties have continued in their efforts at exploring an early negotiated resolution; and  
25 to that end, Convergent has produced and the parties have analyzed substantial time, pay, and  
26 related data for the putative collective/class outlined in the Complaint. The parties had to continue  
27 their previously scheduled mediation date with mediator Michael Russell (August 11, 2021), but  
28 have rescheduled their mediation for the earliest mutually convenient alternate date available,

1 October 7, 2021, where they plan to work in good faith to achieve an early resolution of this matter.  
2 The parties seek to avoid the time, effort, and costs associated with ongoing litigation pending the  
3 results of their efforts to resolve this matter; and according, ask this Court to further extend the  
4 above deadlines.

5 Specifically, the parties request that the Court extent the current deadline for Defendant to  
6 file and serve its Response to Plaintiff's Complaint from August 25, 2021, until October 21, 2021  
7 (i.e., two weeks after the above referenced mediation) so that the parties can continue their efforts  
8 to engage in good faith efforts to explore the resolution of this action.

9 The parties stipulate that good cause exists under LCR 7, Fed. R. Civ. P 16(b)(2), and LCR  
10 16(b) to continue the above-referenced deadlines because the parties have agreed to engage in a  
11 near term, good faith exploration of a resolution of this matter that could obviate any further  
12 proceedings. The parties likewise stipulate that the requested extension promotes the policy  
13 supporting the voluntary resolution of disputes and preservation of judicial resources, and would  
14 facilitate an orderly administration of justice.

15 This Stipulation is based upon the following, and the parties agree:

16 1. That this request is made in good faith and not for the purpose of delay.  
17 2. That nothing in this Stipulation, nor the fact of entering the same, shall be construed  
18 as waiving any claim and/or defense held by any party.

19 **IT IS SO STIPULATED.**

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1 DATED this 19th day of August 2021.

2 FRANK FREED SUBIT & THOMAS LLP

3 By: /s/ Michael Subit

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10 Attorneys for Plaintiff and Putative Class  
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21 Attorneys for Plaintiff and Putative Class  
22 Members

## II. ORDER

Pursuant to the above stipulation, it is SO ORDERED.

DATED this 25<sup>th</sup> day of August, 2021.

Ricardo S. Martinez  
RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE